

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE MOTION FOR LATE ACCEPTANCE OF
RESPONSES TO AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES**
(January 25, 2012)

The United States Postal Service moves for late acceptance of the filing of the responses to the following interrogatories of the American Postal Workers Union, AFL-CIO: APWU/USPS-T4-1, 2(i)-(j), and 10. Identification of responsive information and development of thorough answers to the questions have been diligently pursued from the time the interrogatories were filed. The time taken to file the responses is a result of the complexity of the questions and the need for (sometimes extensive) cross-functional coordination and review, and the press of PRC Docket No. N2012-1 and other equally important postal business. Today's responses are filed thirteen calendar days late. The Postal Service regrets the delay, but believes that any prejudice is minimal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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